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8
9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 Alyssia Nungaray, a minor, by and through
11 her parents, Fernanda Jiminez and Adan
Nungaray,

12 Plaintiffs,

13 v.

14 Pokroy Medical Group of Nevada, LTD., *et*
15 *al.*,

16 Defendants.

Case No. 2:25-cv-00014-JAD-MDC

Stipulation to Extend United States'
Deadline to File Response to Plaintiff's
Complaint

(First Request)

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18 Plaintiffs, Fernanda Jiminez and Adan Nungaray, through counsel and the United
19 States of America, on behalf of Federal Defendants, through undersigned counsel, hereby
20 agree and stipulate to extend the deadline to file a responsive pleading to Plaintiff's
21 Complaint from March 17, 2025 to April 2, 2025. The parties enter into this stipulation
22 based on the following:

- 23 1. Plaintiff filed the Complaint on January 3, 2025 (ECF No. 1).
24 2. Plaintiff served the United States with a copy of the Summons and
25 Complaint on January 16, 2025.
26 3. The current deadline for the United States to respond to the Plaintiff's
27 Complaint is March 17, 2025.
28

1 Plaintiff and the United States, through undersigned counsel, agree and stipulate
2 that the United States' time to respond to the Plaintiff's Complaint shall be extended
3 through April 2, 2025. This is the first request for an extension of time.

4 The extension of time is necessary for the United States' counsel to obtain and
5 review the relevant information regarding the allegations in Plaintiff's complaint and to
6 accommodate United States' counsel's workload in other cases.

7 Therefore, the parties request that the Court extend the deadline for the United
8 States to file a responsive pleading to Plaintiff's Complaint through April 2, 2025.

9 This stipulated request is filed in good faith and not for the purpose of undue delay.

10 Respectfully submitted this 11th day of March 2025.

11
12 BREEDEN & ASSOCIATES, PLLC

13 /s/ Adam J. Breeden

14 ADAM J. BREEDEN, ESQ.
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17 *Attorney for Plaintiff*

SUE FAHAMI

Acting United States Attorney

/s/ Karissa D. Neff

KARISSA D. NEFF
Assistant United States Attorney

Attorneys for the United States

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19 **IT IS SO ORDERED:**

20
21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** 3-12-25
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